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Ryanair's Responses to Written Questions for Ryanair

Initial statement: Ryanair objects that these questions because they are neither necessary nor proper. Ryanair in no way accepts or admits the phrasing of the defendants' questions or headings. Merely as an example, Ryanair in no way admits that any noticed questions went unanswered in previous depositions. As discussed in conferrals and expressed in correspondence, Ryanair has agreed to answer certain questions to avoid further unnecessary expenses. Ryanair incorporates its objections to both the previous Rule 30(b)(6) deposition notices and defendants' previously-served interrogatories.

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Questi	ions Relatea to Interrogatories Proviaea After Prior 30(b)(b) Deposition:
1.	In Ryanair's Fourth Supplemental Response to Interrogatory No. 6, Ryanair added a table
	that purports to demonstrate
	Identify the time period that the table covers,
	including beginning and end dates (e.g. Jan 1. 2023-Sept. 1, 2023).
Respo	nse to Question 1:
	The table added in Ryanair's Fourth Supplemental Response to Interrogatory No. 6 covers
the per	riod from July 24, 2023 to August 23, 2023.
2.	In Ryanair's Second Supplemental Response to Interrogatory No. 15, Ryanair added a table
	that lists
	a. State whether the list is complete,
	b. If the list is not complete, please provide a complete list

	c.	If known, please state whether,
	d.	State what year this data relates to.
	e.	Identify who collected this data.
Respo	onse to	Question 2:
	a. The	e list contains
	b. The	e list is complete.
	c. Thi	s information is not known to Ryanair.
	d. Th	is data relates to the year 2023.
	e. Thi	is data was collected by
3.	Descri	be how the test laid out in Ryanair's Fourth Supplemental Response to Interrogatory
	No. 5	was conducted, including who conducted the test and when the test was conducted.
Respo	onse to	Question 3:
	The te	est laid out in Ryanair's Fourth Supplemental Response to Interrogatory No. 5 was
condu	cted by	

Questions Unanswered from Sept. 29, 2023 Deposition

1. Rega	rding Ryanair's Third Supplemental Response to Interrogatory No. 2:
a	. State the general job functions and annual salaries of each of the employees listed
	in Ryanair's Third Supplemental Response to Interrogatory No. 2, including
b	. Identify which contracting company or companies Ryanair uses to contract for
	from 2018 through August 2022.
c	. Identify the individual who calculated the numbers in the graph on page 30 of
	Ryanair's Third Supplemental Responses to Defendants' First Set of
	Interrogatories that purports to show
Response to	Question 1:
a.	





2. State the amount Ryanair paid
Response to Question 2:
Therefore, the requested information is not known to Ryanair and not accessible by Ryanair.
3. State when Ryanair began working with
Response to Question 3:
Ryanair began using
4. Regarding Exhibit 155 to the 9/29/2023 30(b)(6) deposition of John Hurley
a. Identify whether Exhibit 155 relates to
b. State what stands for on Exhibit 155.
c. State what the number represents on the bottom of the third column on
Exhibit 155 at RYANAIR-BOOKING_0065418.
Response to Question 4:
a. Exhibit 155 relates to
b.
c. The number

5. Identify the number of Ryanair passengers that checked-in with Ryanair desk agents at airports between September 4, 2020 and April 15, 2023.

Response to Question 5:

Ryanair has already provided this information at RYANAIR-BOOKING_0080660.

6. State the total that Ryanair has paid

Response to Question 6:

Ryanair has already provided this information at RYANAIR-BOOKING_0065290 - RYANAIR-BOOKING_0065318.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

RYANAIR DAC,

C.A. No. 1:20-cv-01191-WCB

Plaintiff,

V.

BOOKING HOLDINGS INC., BOOKING.COM B.V., KAYAK SOFTWARE CORPORATION, PRICELINE.COM LLC, and AGODA COMPANY PTE. LTD.,

Defendants.

VERIFICATION OF RYANAIR'S RESPONSES TO WRITTEN QUESTIONS TO RYANAIR

I, John Hurley, declare:

- 1. I am authorized by Ryanair to make this verification as to Ryanair's Responses to Written Questions to Ryanair ("Responses").
- 2. I have read Ryanair's Responses and am familiar with the contents of them.
- 3. The Responses were prepared with the assistance of legal counsel for Ryanair, upon whom I've relied. Any errors in the Responses were inadvertent and unknown at the time of service, and the responsive information was necessarily limited by Ryanair's records and information currently in existence, collected, and discovered at the time of service. To the best of my knowledge and belief, Ryanair's Responses are true.
- 4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14 day of December, 2023

John Hurley

Chief Technology Officer

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